

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

LAM RESEARCH CORPORATION, a  
Delaware corporation,

Plaintiff,

vs.

SUBHASH DESHMUKH, a Washington  
resident,

Defendant.

Cause No. CV4-5435FDB

**STIPULATION TO STAY DISCOVERY IN  
ORDER TO ENGAGE IN MEDIATION  
AND TO EXTEND DISCOVERY DATES  
AND PROPOSED ORDER GRANTING  
STIPULATION**

**NOTE FOR MOTION CALENDAR:  
October 18, 2005**

**I. MOTION**

Plaintiff Lam Research Corporation and Defendant Subhash Deshmukh, pursuant to Local Rule CR 7(d)(1), move for an order (1) staying discovery for a period of two weeks (October 14, 2005 – October 28, 2005) and (2) extending the expert witness objections date to November 10, 2005 and the discovery cutoff date to November 22, 2005. The November 22, 2005 date, although being slightly longer than the stay period is necessary so as to accommodate each party's expert witness schedule with respect to expert witness depositions. The stay applies to all discovery excluding (1) a presently filed motion in the United States District Court for the

1 Northern District of California seeking an order to compel Applied Materials, Inc. to produce  
2 certain documents requested pursuant to subpoena and (2) an outstanding subpoena to third party  
3 Fujitsu Microelectronics America, Inc.

4 Good cause exists for the above requested stay and extension in that the stay is requested  
5 in order for the parties to engage in mediation of this matter. As the Court is aware, this lawsuit  
6 has been vigorously contested by both parties, and a stay of discovery in an effort to resolve this  
7 case may assist the parties in achieving resolution.  
8

9 Neither party intends this extension to have any impact upon the impending trial date  
10 identified in the Court's Initial Minute Order Scheduling Court Trial and Pretrial Dates.

11 Stipulated to this \_\_\_\_ day of \_\_\_\_\_ 2005.  
12  
13

14 HOLLAND & KNIGHT LLP

15 By: \_\_\_\_\_  
16 Alexander A. Baehr, WSBA No. 25230  
17 Attorneys for Plaintiff

18 CORR, CRONIN, MICHELSON,  
19 BAUMGARDNER & PREECE, LLP

20 By: \_\_\_\_\_  
21 Kelly P. Corr, WSBA No. 00555  
22 Kelsey Joyce, WSBA No. 29280  
23  
24  
25  
26

1 **ORDER**

2 Pursuant to Local Rule CR 10(g), it is so ORDERED.

3 Entered this 21<sup>st</sup> day of October 2005.

4 

5 **FRANKLIN D. BURGESS**  
6 **UNITED STATES DISTRICT JUDGE**

7  
8 Presented by:

9 **HOLLAND & KNIGHT LLP**

10  
11 \_\_\_\_\_  
12 Alexander A. Baehr, WSBA No. 25320  
Attorneys for Plaintiff.

13 # 3312007\_v1  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26